

## EXAMPLE [16]

### SAMPLE CUMULATIVE IMPACT DISCUSSIONS

#### LAND USE CONSISTENCY AND COMPATIBILITY

As described in Section 4.2 of this DEIR, implementing the proposed project would not physically divide a community. It therefore also would not contribute to a cumulative impact regarding this issue. (See *Santa Monica Chamber of Commerce v. City of Santa Monica* [2002] 101 Cal.App.4th 786, 799 (“[j]ust as zero when added to any other sum results in no change to the final amount, so, too, when no environmental impacts cognizable under CEQA are added to the alleged environmental impacts of past projects, there is no cumulative increased impact”); see also State CEQA Guidelines §15130[a] (“[a]n EIR should not discuss impacts which do not result in part from the project evaluated in the EIR”).)

Impacts involving land use plans or policies and zoning generally would not combine to result in cumulative impacts. The determination of significance for impacts related to these issues, as considered in Appendix G of the State CEQA Guidelines, is whether a project would conflict with any applicable land use plan or policy adopted for the purpose of reducing or avoiding environmental impacts. Such a conflict is site specific; it is addressed on a project-by-project basis. As described in Section 4.2 of this DEIR, implementing the proposed project would not result in significant land use planning impacts, and the project’s ultimate consistency with local land use plans, policies, and zoning is ensured through entitlements to revise the City General Plan. The project is also consistent with the SJMSCP, a regional-scale planning document. Further, related projects in the City are, to the extent that proposed land uses have been identified, apparently consistent with environmental plans and policies. Because no land use impacts would occur on a project-specific basis, the project would not contribute to any potential cumulative land use impacts.

#### CULTURAL RESOURCES

Available information indicates that south Placer County is a rich source of cultural and paleontological material. For archaeological resources, information from individual cultural resources are most valuable to the record collectively. A cultural context for the South Placer area may be established by combining these individual resources. Both the *Placer County General Plan Update* and the *Auburn/Bowman Community Plan* provides policies that are essential to protecting cultural resources from future development. Nevertheless, the *Placer County General Plan Update EIR* and the *Auburn/Bowman Community Plan EIR* conclude that the cumulative impact of development on cultural resources is considered potentially significant. They identify no feasible mitigation measures beyond the policies and programs included in the *General Plan Policy Document* and the adopted mitigation measures in the *Auburn/Bowman Community Plan EIR* that would reduce the possibility of occasional accidental disruption of important archaeological, historic, or paleontological sites to a less than significant level. The *Auburn/Bowman Community Plan EIR* reaches this conclusion based in part on the County’s inability to enforce monitoring and oversight on ministerial actions. The projects identified in the Home Depot DEIR’s prospective projects list are all in areas identified for development in those plans, and provide a mix of land uses that would contribute to the loss of important archaeological, historic, or paleontological sites.

A record search and site archaeology survey were performed for the proposed project site. Native American groups were also contacted, based on information provided by the Native American Heritage Commission. No known archaeological or important Native American resources occur on the site. Mitigation measures have been identified to deal with the unanticipated encountering of currently unknown archaeological and paleontological resources during construction. Since this project is not ministerial, and the mitigation

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measures identified in this DEIR are enforceable and the Applicant will be required to provide evidence of their implementation, the proposed project's incremental contribution to cumulatively significant impacts on archaeological or paleontological sites is not considered cumulatively considerable, and the Home Depot project's cumulative impacts to archaeological or paleontological sites are therefore not significant.

The Applicant proposes to develop the proposed project on a site that is located within the DeWitt General Hospital Historic District. This historic district appears to be eligible for the National Register of Historic Places (NRHP)/California Register of Historic Resources (CRHR) under criteria A/1 and C/3, and thus for the purposes of CEQA is considered a cultural resource.

The Home Depot project is one of several that are proposed within the DeWitt General Hospital Historic District. Other projects, in addition to the Home Depot project, include, but are not limited to, the Placer County Justice Center and the Placer County Land Development Building. The Placer County Justice Center's proposed location is the southwest corner of Richardson Drive and B Street, and the Placer County Land Development Building's proposed location is on Bell Road between Richardson Drive and 1st Street. These projects are part of a plan by Placer County to develop facilities related to County services within or immediately adjacent to the DeWitt General Hospital Historic District. The development and construction of each of these projects would require the incremental demolition, destruction, and/or alteration of contributing features of this NRHP/CRHR-eligible historic district. Over time, these incremental actions would adversely affect those physical characteristics of the DeWitt General Hospital Historic District that convey its historical significance and justify its eligibility for the NRHP and CRHR. Demolition of contributing features to the DeWitt General Hospital Historic District as a part of the Home Depot project is considered cumulatively considerable. This would be a cumulatively significant and unavoidable impact to historic resources.

One mitigation measure has been identified to mitigate this cumulatively significant impact, as described below. It should be noted that this mitigation measure does *not* mitigate the cumulative impact to a less than significant level, and therefore this impact remains a cumulatively significant adverse impact to cultural resources.

### **Mitigation Measure CUM-1: Pay pro-rata share (with Placer County) to conduct Historic American Buildings Survey (HABS) recordation of the DeWitt General Hospital Historic District**

HABS recordation shall be undertaken for the DeWitt General Hospital Historic District. The purpose of this HABS recordation is to provide a written and visual record of this historic district prior to changes that would adversely affect its historical significance. This recordation shall include the preparation of a written report and large format photographs. Additionally, any original plans that are available on the hospital shall be recorded through large format photography. The HABS recordation shall be completed prior to any ground-disturbing activities within the DeWitt General Hospital Historic District. The HABS recordation shall meet the HABS Standards and should be done by professionals who met the Secretary of the Interior's professional qualifications for architectural historians and photographers. The negatives, large format contact prints, and photographic index and written report shall be provided to the state archive. A copy of this recordation shall be provided to local repository.

## **PALEONTOLOGICAL RESOURCES**

Results of a paleontological record search at the UC Berkeley Museum of Paleontology indicated no fossil remains within the immediate vicinity of the proposed project site, and no fossils have been observed on surface soils during various field visits. The closest identified vertebrate fossils to the proposed project site

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are located approximately 5 miles to the southeast near Manteca, approximately 7 miles north of the proposed project site in Stockton, and approximately 9 miles north of the proposed project site in Lincoln Village.

Important fossil finds in the project region have been isolated and rare. No concentrations of fossils or areas with relatively high densities of fossils have been identified in the project region. Although fossils may have been unknowingly disturbed or destroyed during past projects in the region, no evidence is available of this occurring with any frequency (as is the case with disturbance of many archaeological sites). Often fossil discoveries, and the subsequent opportunities for data collection and study, result from excavations and soil moving associated with development. Because of the low potential for projects to intersect fossils, and the ability to collect data from fossils when they are encountered, development of the related projects and other development in the region is not considered to result in a significant cumulative impact on paleontological resources.

As-yet-undiscovered subsurface paleontological resources might also underlie the CLSP area and related project sites. Mitigation measures are outlined in Section 4.17 of this DEIR, Paleontological Resources, to reduce impacts on previously undiscovered paleontological resources to less-than-significant levels. Implementing these mitigation measures also would ensure that implementing the proposed project would not incrementally contribute to cumulative impacts on important paleontological resources in the project region.

### AIR QUALITY

The *Placer County General Plan Update EIR* identified significant cumulative impacts associated with development, and particularly identified substantial increases in NO<sub>x</sub> and PM<sub>10</sub> emissions that would result in violations of ambient air quality standards. The *Auburn/Bowman Community Plan EIR* identified significant cumulative air quality impacts related to construction activity, as well as stationary sources and mobile emission sources. Construction activity resulting from the proposed project and other development assumed in the *Placer County General Plan Update* and the *Auburn/Bowman Community Plan*, and projects identified in the Home Depot DEIR's prospective projects list, would result in construction emissions from earthmoving activities, heavy-duty equipment operations, and workers traveling to and from the construction sites. Earthmoving activities could result in substantial fugitive dust (PM<sub>10</sub>) emissions and may generate localized concentrations that exceed the federal and state standards identified in Section 8.2 of this Draft EIR. Construction equipment operation and construction employee vehicle trips would generate exhaust emissions, including ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, and SO<sub>2</sub>. This would be a cumulatively significant impact. Even with feasible mitigation measures, the proposed project's incremental contribution to this significant impact would be cumulatively considerable. This would be a cumulatively significant and unavoidable impact in the short-term.

The *Placer County General Plan Update* includes policies aimed at reducing ozone precursor and particulate emissions associated with cumulative development in Placer County. These policies are of particular importance since the portion of Placer County surrounding the proposed project site is currently designated as being in nonattainment for the state and federal 1-hour average O<sub>3</sub> standard and the state PM<sub>10</sub> standard. The proposed project would result in an increase in regional criteria pollutant emissions. The increases, as compared to the federal and state standards, are identified in Section 8.3 of this Draft EIR. Two pollutant emissions resulting from operation of the proposed project would exceed the most stringent standards: NO<sub>x</sub> and CO. Mitigation measures included in this Draft EIR would reduce emissions of project-related NO<sub>x</sub> to less than significant levels through payment of PCAPCD's offsite mitigation fund. These fees would be used to improve air quality through funding of public transportation, commuter rideshare programs, heavy-duty NO<sub>x</sub> reduction programs, and the woodstove replacement program. Based on this fee program, Home Depot's incremental contribution to cumulative NO<sub>x</sub> emissions would be reduced but not eliminated. Due to the severity of this cumulative impact, the proposed project's contribution to NO<sub>x</sub> emissions is considered cumulatively considerable, even though it is reduced to a less than significant level for the proposed project alone through mitigation.

## EXAMPLE [16] continued

No feasible mitigation was identified for reduction of CO emissions associated with project operations. Cleaner vehicles being introduced into the fleet mix to meet increasingly stringent emissions standards will reduce emissions to below the standards for CO by approximately 2009, and for NO<sub>x</sub> by about 2013. However, because Placer County is currently designated as being in nonattainment for the state and federal 1-hour average O<sub>3</sub> standard and the state PM<sub>10</sub> standard, the proposed project's contribution to ozone precursors and particulate emissions is considered cumulatively considerable. This would be a cumulatively significant and unavoidable air quality impact.

Unlike regional emissions, CO concentrations are localized, based on traffic conditions at individual intersections. CO concentrations at study area intersections were evaluated for the Year 2020 condition in Section 8.3.2 of this Draft EIR. The Year 2020 condition considered cumulative traffic conditions based on the Traffic Impact Study prepared for the proposed project. Based on that analysis, the proposed project, when added to projected future traffic, would not result in cumulatively significant impacts related to local CO concentrations. Since cumulative impacts from the proposed project and related projects are not significant, the proposed project, by itself, cannot cause a cumulatively considerable incremental impact. The Home Depot project's cumulative impacts related to CO concentrations are therefore not significant.

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### SOILS, GEOLOGY, AND SEISMICITY

No cumulative impacts related to soils, geology, or seismicity were identified in the *Placer County General Plan EIR*, Cumulative impacts to geology related to landform alteration and erosion control were identified in the *Auburn/Bowman Community Plan EIR*. The projects identified in the Home Depot DEIR's prospective projects list are all in areas identified for development in those plans, and provide a mix of land uses that would alter topography and increase the potential for erosion (see discussion under cumulative land use impacts, above), but not above those contemplated in the above-referenced EIRs.

At the proposed site, onsite grading would alter the site topography, to achieve a level building/parking lot pad. This impact would be fully mitigated through conducting all work in accordance with the Placer County Grading Ordinance (as described in Section 3.8 of this Draft EIR) and as identified in mitigation measures contained in Chapter 11. This ordinance requires that all retaining structures for cut and fill slopes would be designed and constructed in accordance with the Applicant's site-specific geotechnical report. Therefore, the proposed project's incremental contribution to this less than significant cumulative impact would not result in a cumulatively significant topographic alteration. Since cumulative impacts from the proposed project and related projects are not significant, the proposed project, by itself, cannot cause a cumulatively considerable incremental impact. The Home Depot project's cumulative impacts related to topographic alteration are therefore not significant.

The Applicant has incorporated a Grading and Erosion Control Plan as part of the proposed project, as described in Section 3.8 of this Draft EIR. This plan incorporates a suite of Best Management Practices, consistent with the mitigation measures identified in Chapter 11, that would be applied to areas within the proposed project site that are susceptible to erosion. The mitigation measures, including the Best Management Practices identified in Section 3.8, would control the proposed project's erosion-related impacts. Therefore, the proposed project's incremental contribution to this less than significant cumulative impact would not result in cumulatively significant erosion. Since cumulative impacts from the proposed project and related projects are not significant, the proposed project, by itself, cannot cause a cumulatively considerable incremental impact. The Home Depot project's cumulative impacts related to erosion are therefore not significant.

Potentially significant project impacts are expected to occur due to difficult excavation conditions associated with the presence of hard rock in the southwestern corner of the site, where the excavation would be the deepest. This impact would be mitigated through conducting all work in accordance with the Placer County Grading Ordinance identified above, and implementation of a Blasting Plan included as a mitigation measure in this Draft EIR. This impact is localized and mitigated. Therefore, the proposed project's incremental contribution to any less than significant blasting impacts would not be cumulatively considerable. Since cumulative impacts from the proposed project and related projects are not significant, the proposed project, by itself, cannot cause a cumulatively considerable incremental impact. The Home Depot project's cumulative impacts related to blasting are therefore not significant.

Given that cumulative impacts related to geology, soils, and seismicity are less than significant, the localized, short-term nature of the proposed project impacts that are related to construction, incorporation of Best Management Practices as part of the proposed project, implementation of the mitigation measures identified in Chapter 11, and existing *Placer County General Plan* policies and ordinances that address them, the proposed project's incremental contribution to this less than significant cumulative impact would not result in cumulatively significant blasting impacts. Since cumulative impacts from the proposed project and related projects are not significant, the proposed project, by itself, cannot cause a cumulatively considerable incremental impact. The Home Depot project's cumulative impacts related to soils, geology, or seismicity are therefore not significant.

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### HYDROLOGY, WATER QUALITY AND GROUNDWATER

No cumulative impacts related to hydrology or water quality were identified in the *Placer County General Plan EIR*. The *Auburn/Bowman Community Plan EIR* identifies that significant cumulative impacts might occur in the areas of hydrology/water quality, specifically related to increases in stormwater runoff and flooding at bridges and culverts, regional downstream flooding, and groundwater quality. The projects identified in the Home Depot DEIR's prospective projects list are all in areas identified for development in those plans, and provide a mix of land uses that would increase stormwater runoff and flooding, and potentially affect surface and groundwater quality.

The proposed project has incorporated preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) as required by the State Water Resource Control Board, and a Storm Water Management Plan using the guidelines in the Placer County Stormwater Management Manual. The elements of these plans and their performance standards are described in Section 3.8 of this Draft EIR. These plans are consistent with the policies, goals, and implementation measures identified in the *Placer County General Plan Update* and the *Auburn/Bowman Community Plan* and the mitigation measures set forth in their respective EIRs. They are protective of water quality and with their implementation, along with the mitigation measures identified in Chapter 13 of this Draft EIR, the proposed project's incremental contribution to cumulatively significant water quality impacts is therefore not considered cumulatively considerable, and the Home Depot project's cumulative impacts to water quality are therefore not significant.

Cumulative development would increase the level of urbanization within the Rock Creek and Dry Creek basins. Development usually results in an increase in the volume and rate of runoff due to reduced percolation of surface water, smoother and more impervious ground surfaces, and acceleration of runoff caused by storm sewer facilities. Covering the ground with impervious surfaces also typically results in water quality degradation when automobile and other urban-based wastes are washed off of the surfaces into creeks.

The *Auburn/Bowman Community Plan* policies and programs are intended to mitigate the potential flooding and water quality problems that may arise from development. New developments are required to detain onsite drainage such that the rate of runoff is maintained at pre-development levels. Because peak runoff rates from new development would be maintained at pre-development levels, increase in channel erosion and sedimentation are not expected to occur. Implementation of the *Auburn/Bowman Community Plan's* policies and programs requiring cost-effective urban runoff control, including Best Management Practices, along with the mitigation measures identified in Chapter 13 of this Draft EIR, would reduce urban pollutants entering watercourses. However, cumulative development may contribute to significant downstream flooding impacts by increasing the overall non-peak flow rates. As discussed in the *Auburn/Bowman Community Plan EIR* (Planning Concepts, 1994), these impacts appear to be mitigable with a regional detention facility, but this mitigation is not ensured because no plans and no funding proposals are in place. Given the specific policy directives of the *Auburn/Bowman Community Plan*, significant cumulative impacts related to peak flow impacts and water quality impacts are not expected to occur, but cumulative impacts on downstream flooding from non-peak flows are considered significant impacts, which cannot be mitigated without a regional detention facility. The proposed project's incremental contribution to significant and unavoidable downstream flooding impacts from non-peak flows is considered cumulatively considerable until a regional detention facility is operating. This would be a cumulatively significant and unavoidable impact.

Cumulative impacts may be significant to groundwater if local aquifer extraction is increased and/or a recharge area is reduced significantly by increasing impervious area. The majority of the proposed project site would be developed, resulting in the creation of impervious surfaces. Because potential groundwater recharge at the proposed project site is currently limited due to underlying soils types and hard rock, and water from flows released from detention facilities to downstream channels could provide some recharge, little change in recharge opportunities is expected as a result of the proposed project. The same subsurface conditions would reduce the potential for pollutants that could be in stormwater runoff to affect groundwater

## **EXAMPLE [16] continued**

quality, especially since filtration devices would be installed on each storm drain inlet to trap pollutants prior to their entering the detention facilities. Therefore, the proposed project's incremental contribution to cumulatively significant impacts on groundwater recharge or groundwater quality is therefore not considered cumulatively considerable, and the Home Depot project's cumulative impacts to groundwater recharge or groundwater quality are therefore not significant.

### **SURFACE DRAINAGE**

The proposed drainage facilities identified as part of the CLSP project would be constructed to safely control and convey stormwater runoff. In summary, the drainage plan designates five separate drainage sub-basins within the CLSP area (see Exhibit 3-5). Each sub-basin would be served by gravity conveyance of stormwater drainage to detention basins (and/or other appropriate detention facilities), and a pump station and force main that would collect and pump stormwater to one of two centralized pump stations and discharge outfalls along the bank of the San Joaquin River for discharge to the river. Therefore, the proposed project would not divert runoff to adjacent properties or result in drainage impacts on such properties. In other words, the CLSP would not contribute at all to any significant cumulative impacts that might be caused by related projects outside the City that are not subject to the same drainage requirements.

### **GROUNDWATER QUALITY**

The proposed project would include construction activities that could affect shallow groundwater, would generate urban runoff that could come into contact with groundwater, and would dispose of recycled water on land. Each of these elements would represent a potential source of groundwater quality degradation. However, the proposed project would implement multiple measures to prevent contaminants from reaching the groundwater. These include implementation of BMPs to reduce potential contamination during construction, tertiary treatment of wastewater to Title 22 standards for unrestricted use to avoid potential contamination of the environment, application of recycled water at agronomic rates to minimize percolation of recycled water below the root zone, and compliance with discharge and application regulations and permits. Therefore, percolation of pollutants to potable groundwater used for local private or municipal wells would not occur.

The related projects would be developed at multiple locations with varying depths to groundwater, would generate varying degrees of construction and urban runoff, would likely implement varying levels of application rates for the land disposal of recycled water, and would likely implement varying levels of BMPs to protect groundwater. Some of the related projects, such as the WRP #1 Phase 1 Expansion, the Crossroads Industrial Park, and the South Lathrop Specific Plan, would include industrial components that could potentially involve the use and/or storage of untreated wastewater and/or hazardous materials that, if allowed to percolate to the groundwater, could result in groundwater quality degradation. Although there would likely be considerable variation among the related projects, and thus potentially varying levels of possible groundwater impacts, there are a considerable number of regulatory safeguards in place to ensure that groundwater contamination does not occur. These include, but are not limited to, treated wastewater discharge requirements, separation distance requirements between wastewater storage ponds and groundwater, storage pond lining requirements, and hazardous materials handling requirements. Furthermore, most of the related projects would replace existing agricultural operations that use pesticides, herbicides, and fertilizers over large areas. Therefore, it is anticipated that less-than-significant cumulative impacts would occur, and if such impacts were to occur, the proposed project would not contribute to them.

The proposed project does not include the development of new wells, nor do the proposals for most of the related projects. However, the proposed project along with some of the related projects (e.g., Mossdale Landing, Mossdale Landing East, River Islands) would rely on new City wells for potable water. Impacts associated with supplying future citywide water demands were evaluated in the Water Master Plan EIR. The

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Water Master Plan EIR found that the planned groundwater use would result in a significant impact associated with the advancement eastward of the 500 milligrams per liter (mg/l) groundwater concentration front for total dissolved solids (TDS). However, this impact would be mitigated to a less-than-significant level through site-specific analysis and well design to maximize the quality of water produced by each well, monitoring of water produced by each well, water treatment, blending with surface water sources (i.e., SSJID deliveries), or other actions to improve water quality if monitoring showed that water produced by the well did not meet applicable drinking water standards. In addition, the City's participation (along with other cities in the region) in the SSJID SCSWSP will reduce the dependence on groundwater, and potentially the eastward advancement of higher TDS concentrations. Because impacts associated with groundwater production on a citywide basis would not be significant after mitigation, cumulative impacts associated with groundwater use in the City are not considered significant. Since cumulative impacts from the CLSP and related projects are not significant, the CLSP, by itself, cannot cause a cumulatively considerable incremental impact.

### **SOLID WASTE**

Project impacts related to increased generation of solid waste would be considered less than significant. The receiving landfill, the Foothill Sanitary Landfill, has approximately 40 million tons of capacity remaining and is expected to remain open until 2048, including provision for growth in its service area (EDAW 2002). Because this landfill would have adequate capacity to serve the project and other development in its service area, impacts from the CLSP and related projects are not cumulatively significant, and the proposed project therefore would not cause an incremental impact on solid waste disposal that, by itself, is cumulatively considerable.

### **WATER, WASTEWATER, AND RECYCLED WATER**

In 2001, the City completed the Water Master Plan, which programmatically plans for the provision of adequate water and wastewater treatment/disposal capacity to serve City growth through 2030. Under this plan, Well #21 is currently under construction near the southwestern corner of Yosemite Avenue and McKinley Avenue in what is planned to be an expanded City well field to provide required water capacity to serve currently planned growth in the City. Other facilities are included in the Water Master Plan to provide for buildout of the City, and the Water Master Plan EIR evaluates related impacts. It is assumed that the development of related projects, and/or the development of the additional utility systems required to serve them, would be preceded by the required CEQA review. However, it cannot be assumed that all potential environmental impacts associated with the development of the additional water and wastewater capacity and infrastructure required to serve these related projects would necessarily be mitigated to less-than-significant levels. Therefore, potentially significant cumulative utilities impacts could occur related to water and wastewater treatment/disposal capacity.

As discussed in Section 4.11 of this DEIR, a Senate Bill (SB) 610 water supply assessment report has been prepared for the proposed project (Appendix J of this DEIR). The assessment evaluates the adequacy of existing and future water supplies to meet the water demand created by the CLSP project in conjunction with existing development in the City and future related projects: River Islands, Mossdale Landing, and Mossdale Landing East. The Water Master Plan addresses provision of water for full buildout of the City.

As indicated in the water supply assessment and Table 4.11-1 of this DEIR, future water supply for the City would consist of groundwater from the City's existing and planned municipal wells and surface water deliveries from the SCSWSP. Groundwater pumping during normal precipitation years would range from 2,700 AFY in 2005 to 5,100 AFY in 2025. Deliveries from the SCSWSP would begin in 2005 and, assuming normal precipitation years, would range from 8,007 AFY in 2005 to 11,791 AFY in 2025. Of the amount available in 2005, 5,200 ac-ft is anticipated to be required for use by the City. At the same time, it is



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projected that future water demand (i.e., proposed project plus existing plus future cumulative development) would range from 4,514 AFY in 2005 to 15,868 in 2025. As indicated in Table 4.11-1, future water supply available to the City during normal precipitation years, as well as multiple-dry years, would be adequate to meet future water demand during all horizon (2005, 2010, 2015, 2020, 2025) years. In addition, the SSJID SCSWSP provides a dependable water supply for Lathrop and then other cities in the region. Therefore, the CLSP and related projects would not result in cumulative impacts related to water supply.

### RECREATION

Planned residential development in the City and associated increases in population would result in a cumulative increase in the demand for parkland. The project, as proposed, could provide more developed parkland per 1,000 residents than required by the City General Plan standard. If so, the project would provide a net surplus of park facilities and result in a beneficial impact with regard to parkland. Since this impact is beneficial rather than adverse, the project cannot contribute to a cumulatively considerable impact.

The proposed project would include a network of trails and open space corridors that would connect to the Mossdale Landing project to the south and potentially to a regional network of similar facilities to the north. Future development of recreational facilities in and around the City may extend trails and open space corridors beyond the project site and increase regional recreation opportunities. Because the proposed project facilitates the development of a regional network of trails and open space corridors, the CLSP project would result in a beneficial impact with regard to regional recreational opportunities.

### FIRE PROTECTION

No cumulative impacts related to fire protection were identified in either the *Placer County General Plan EIR* or the *Auburn/Bowman Community Plan EIR*. The projects identified in the Home Depot DEIR's prospective projects list are all in areas identified for development in those plans, and provide a mix of land uses that would increase the need for fire protection (see discussion under cumulative land use impacts, above), but not above those contemplated in the above-referenced EIRs. The proposed project would introduce onto the site functional commercial buildings, associated employees and patrons, and a variety of materials and products that could lead to fire incidents if not handled appropriately. This would create additional demand for fire protection services. Placer County Fire Conservation District requirements, 2000 Uniform Fire Code standards, the 2001 California Fire Code, and the Hazardous Materials Business Plan identified in Section 3.8 of this Draft EIR all serve to regulate store operations and are intended to be protective of the public by proactive prevention of activities that could cause fires. The Applicant would be required to comply with all such requirements and regulations, under the direction of the PCFCD. Payment of mitigation fees to fund the project's fair share of capital costs for provision of fire protection services (Albertazzi and Campbell, 2003) would ensure that there would be no diminution of fire service to the community as a result of the proposed project. Since the proposed project would be constructed in accordance with all applicable regulations, and would pay its fair share of capital costs for provision of fire protection services to the project site, the proposed project's incremental contribution to this less than significant cumulative impact would not result in a cumulatively significant impact to fire protection services supply. Since cumulative impacts from the proposed project and related projects are not significant, the proposed project, by itself, cannot cause a cumulatively considerable incremental impact. The Home Depot project's cumulative impacts related to fire protection services are therefore not significant.

### HAZARDOUS MATERIALS

No cumulative impacts related to hazardous materials or wastes were identified in either the *Placer County General Plan EIR* or the *Auburn/Bowman Community Plan EIR*. The projects identified in the Home Depot DEIR's prospective projects list are all in areas identified for development in those plans (see discussion under cumulative land use impacts, above). Projects in areas where naturally-occurring asbestos is contained

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in soil could contribute to cumulative impacts related to hazardous materials during construction. Many of these projects would use or sell hazardous materials, including the gas stations, the All Electric facility, the Chapa de Optometry Building, the Ceronix Corporate Campus (depending on the industrial uses located within the campus), Costco, and restaurant and residential uses. Given the localized nature of these potential impacts, most of which are short-term construction impacts, and because the handling of both hazardous materials and wastes is highly regulated, and because each of these related projects would undergo its own CEQA review and include mitigation based on these regulations, no cumulatively significant impacts related to hazardous wastes or materials are expected.

The proposed project would have potentially significant impacts associated with potential contamination of portions of the site surface with asbestos and lead from the demolition of existing structures at the site and from accidental spills of hazardous materials during construction. In addition, the proposed project has the potential to generate soil containing naturally occurring asbestos during site grading and preparation. In Section 12.3 of this Draft EIR, mitigation measures have been identified that require the Applicant to prepare and implement an Abatement Work Plan for lead and asbestos, a Spill Mitigation Plan for construction activities, and an Asbestos Dust Mitigation Plan to reduce these impacts to less than significant levels. The elements of these plans and their performance standards are described in Section 12.4 of this Draft EIR. During operation of the Home Depot, the potential for accidental release of hazardous materials would be controlled by implementation of a Hazardous Materials Business Plan (HMBP), as required under the California Health and Safety Code. With implementation of the mitigation measures identified in this DEIR, the proposed project's incremental contribution to less than significant cumulative impacts related to hazardous materials would not result in a cumulatively significant impact. Since cumulative impacts from the proposed project and related projects are not significant, the proposed project, by itself, cannot cause a cumulatively considerable incremental impact. The Home Depot project's cumulative impacts related to hazardous materials are therefore not significant.